

AFFIDAVIT

STATE OF NEW YORK)

COUNTY OF RICHMOND) ss.:

Steve Stanulis, being duly sworn, deposes and says:

1. I am over 18 years of age and make these statements on personal knowledge unless otherwise indicated.
2. I, via my company Silver Shield, LLC, have worked under Donald Gaynor, a licensed professional investigator since 2016, license no. 1000186695 (valid until 3/25/23).
3. Under section 81, I/Silver Shield is permitted to do so. See Exhibit "A".
4. I was contacted by Safa Gelardi ("Safa") in or about November 2, 2022, through our marketing materials. This was our first contact (via phone).
5. This was the first and last time Safa used our services.
6. The phone number I have for her is 718-749-4732.
7. In that initial call she wished to have an investigation to follow a former employee.
8. SAFA believed that said employee was soliciting clients and slandering her name.
9. The person she was seeking the information about was Carlos Roa.
10. Initially she requested 10 hours of surveillance and agreed to a "tracker" on his car as well. No other methods were utilized or requested.
11. She paid \$1,000.00 for the surveillance (see Exhibit "B") and \$500.00 for the "tracker" (see Exhibit "C").
12. As the "tracker" was located and removed within 5 minutes, no data was obtained.
13. Safa did not make me aware of any federal lawsuit at the time. No information about any lawsuits or legal proceedings was mentioned to me.

14. As Safa promptly advised me the “tracker” was found, no date was obtained nor shared with Safa.

15. Thomas Brandon placed the “tracker” on the vehicle. He is an independent contractor. No one else was involved from my perspective to my knowledge.

16. I have never had contact with Vito Gelardi.

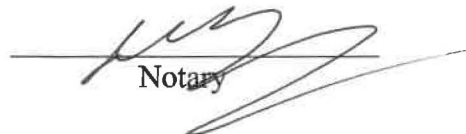
17. Safa never asked me to perform any other services or to investigate any other persons.

18. Text messages are annexed as Exhibit “D”.



Steve Stanulis

Sworn to before me this
1st day of March, 2023



Notary

RICHARD ROSENZWEIG
Notary Public, State of New York
No. 02RO5004702
Qualified in Richmond County
Commission Expires Nov. 23, 2026

EXHIBIT “A”

Subject: NYS dept of state penal law under private investigators section 81 under "Employment"

§81. Employees 1. The holder of any license certificate issued pursuant to this article may employ to assist him in his work of private detective or investigator or bail enforcement agent as described in §71 and in the conduct of such business as many persons as he may deem necessary, and shall at all times during such employment be legally responsible for the good conduct in the business of each and every person so employed. No holder of any unexpired license certificate issued pursuant to this article shall knowingly employ in connection with his or its business in any capacity whatsoever, any person who has been convicted of a felony or any of the offenses specified in subdivision 2 of §74 of this article, and who has not subsequent to such conviction received executive pardon therefor removing this disability, or received a certificate of relief from disabilities or a certificate of good conduct pursuant to article 23 of the Correction Law to remove the disability under this section because of such a conviction, or any person whose private detective or investigator's license or bail enforcement agent's license was revoked or application for such license was denied by the Department of State.

EXHIBIT "B"

3/1/23, 9:59 AM

Transaction Receipt

Merchant: SILVER SHIELD SECURITY LLC

99 Hudson Street
New York, NY 10013
US

212-313-9512

Order Information

Description: Investigation

Order Number:

P.O. Number:

Customer ID:

Invoice Number:

Billing Information

Safa Gelardi
10309

Shipping Information

Shipping: 0.00

Tax: 0.00

Total: USD 1,000.00

Payment Information

Date/Time: 02-Nov-2022 14:27:58 PDT
Transaction ID: 43734757233
Transaction Type: Authorization w/ Auto Capture
Transaction Status: Settled Successfully
Authorization Code: NOCODE
Payment Method: American Express XXXX1009

EXHIBIT "C"

3/1/23, 9:59 AM

Transaction Receipt

Merchant: SILVER SHIELD SECURITY LLC

99 Hudson Street
New York, NY 10013
US

212-313-9512

Order Information

Description: Tracker

Order Number:

P.O. Number:

Customer ID:

Invoice Number:

Billing Information

Safa Gelardi
10309

Shipping Information

Shipping: 0.00

Tax: 0.00

Total: USD 500.00

Payment Information

Date/Time: 07-Nov-2022 11:35:46 PST
Transaction ID: 43746405877
Transaction Type: Authorization w/ Auto Capture
Transaction Status: Settled Successfully
Authorization Code: NOCODE
Payment Method: American Express XXXX1009

EXHIBIT “D”

8:39

24%

< Safa Silver Shiel...    

Monday, Nov 14 • 12:42 PM

S

Hey Steve. I think the tracker was found

Monday, Nov 14 • 7:58 PM

S

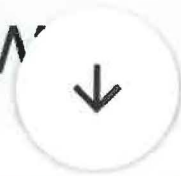
Hey Steve. Can I call you. I have a thought

Good evening Safa
I'm out on a executive
protection job. Can't
use phone can you

call me in AM sorry for
the inconvenience



No worries. I'll call u
tomorrow



Text message



—Screenshot_20230301_083953_Messages.jpg

8:39

24%

< Safa Silver Shiel...    

FOR INCONVENIENCE

Wednesday, Nov 16 • 7:53 AM

Good morning Steve.
Maybe the tracker is
defective.

S

Wednesday, Nov 16 • 5:43 PM

Hey Steve. It seems
that he did find the
tracker. How would
he find it the same
day. This is not fair

day. This is not fair.

The whole thing
won't work now
because he is
skeptical and knows



Text message



— Screenshot_20230301_084000_Messages.jpg

8:40

24%



Safa Silver Shiel...



Hey Steve. No need to check if tracker is working. It is working. He is moving. He must of not left the house for a while.

S

All right 👍

Monday, Nov 21 • 9:49 PM

Hi Steve. He did find the tracker. It's at a

.. . .



police station.

We cN chat
tomorrow and think
of a gam^r lan



Text message



— Attachments: —

Screenshot_20230301_083926_Messages.jpg

431 KB

Screenshot_20230301_083953_Messages.jpg

418 KB

Screenshot_20230301_084000_Messages.jpg

408 KB